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Sent: Friday, March 14, 2014 4:58 PM
To: Streeter, Kevin (PHMSA)
Subject: Response to Notice of Amendment / CPF 3-2013-0002M

Kevin Streeter, P.E.
General Engineer/Inspector
PHMSA – Central Region,

Kevin,

Here is the plan for addressing the NOA Items:

1. Add the following revisions to Section 3, page 1 of the Ferrellgas Pipeline Operations and Maintenance Manual
Certain facilities may meet the description of a Utility Gas Plant as defined in NFPA 59 (2004), "Utility LP-Gas Plant Code." Typically, this applies to any storage facility that exceeds 4000 gallon aggregate capacity and serves 10 or more customers. The standards of NFPA 59 (2004) must be incorporated into the design, operations, and maintenance of those facilities.

2. Add the following revisions to Section 1, page 25 of the Ferrellgas Pipeline Operations and Maintenance Manual
NFPA 59 10.1.4 - Testing Relief Devices:

On containers that must comply with NFPA 59 (2004), "Utility LP-Gas Plant Code", relief devices shall be tested for proper operation at intervals not exceeding five years. This may be accomplished by removing the existing devices, placing them in a testing device, and checking for proper "start to discharge setting" with compressed air or inert gas. It may also be accomplished by replacing the devices with new or previously tested devices that meet the requirements for that container. Record the results on a "Relief Valve Inspection Report" form.

Regarding the schedule for testing or replacing relief valves on those facilities that fall under NFPA 59, here is the plan:

We propose to start with a schedule for identifying the systems which will be affected. The Service Centers will need to evaluate the systems and determine if the existing containers would stay in place or if a change needs to be made where the testing could be accomplished without total evacuation of the container. The schedule for completing this phase is 12 months, or March 14th 2015. We would then be able to project a timeline for completion of testing. Our Service Centers need some time to adjust budgets to allow for the financial impact of this procedure. As you know, we (and the rest of the industry) have never been held to comply with this requirement in the past. This is new territory for us and we need time to adjust.

3. I believe we may have missed the relevant section of our Manual that addresses this requirement during the audit. Section 1, page 2 of the Ferrellgas Pipeline Operations and Maintenance Manual already has the following terminology:

Service Center General Managers are responsible for the operation of pipeline systems. This includes ensuring periodic review of work performed by Employees to determine the effectiveness and adequacy of procedures, and advising the Safety Department when deficiencies are found. Service Center General Managers are responsible for contacting the Liberty Safety Department for interpretations or clarification of any regulations or definitions, i.e., whether a system is jurisdictional or if a particular part of a system is a business district or if a new system is acquired.

4. Add the following revisions to Section 1, page 12 of the Ferrellgas Pipeline Operations and Maintenance Manual 192.605(b)

Field Management shall document the review and acceptance of contracts accepted for work being performed on their systems. Contracts should reflect language that ensures contractors will comply with all requirements of Pipeline Safety Rules as referenced in CFR Title 49 Part 192. Copies of contractor's procedures used in construction and maintenance shall be maintained in the Operations and Maintenance Manual

Our normal cycle is to make all revisions in June of each year. If that is acceptable, we will work on making these revisions applicable this coming June. That will give me time to let our Legal department review and approve and for developing the material that we distribute to the Field.

Thank you,

Rufus Youngblood

Ferrellgas

Director - Safety

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